

HONORABLE MICHELLE PETERSON

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

NANNETTE BASA, an individual,

Plaintiff,

v.

BRAND SHARED SERVICES, LLC, a
Delaware corporation,

Defendant.

Case No. 2:21-cv-00754 JLR

DECLARATION OF MEG NEWMAN IN
SUPPORT OF DEFENDANT BRAND
SHARED SERVICES, LLC'S MOTION
FOR PROTECTIVE ORDER QUASHING
DEPOSITION OF MEG NEWMAN

HEARING DATE:
FRIDAY, SEPTEMBER 2, 2022

I, Meg Newman, hereby declare:

1. I am over the age of eighteen and competent to testify in this matter. I base this declaration on my personal knowledge.

2. I am the Chief People Officer for Defendant Brand Shares Services, LLC's ("Brand"), which means that I am the highest ranking employee in Brand's human resources department, overseeing approximately 244 employees. I have served in this role since July 2019. I work out of Brand's headquarters in Kennesaw, Georgia.

3. I overlapped with Plaintiff Nannette Basa ("Plaintiff") for about a year-and-a-half while she was employed by Brand. During that time, I was always at least two reporting levels removed from Plaintiff. Plaintiff worked remotely from her home in Washington. I do not believe that I ever met Plaintiff in person.

DECLARATION OF MEG NEWMAN IN SUPPORT OF DEFENDANT'S MOTION
FOR PROTECTIVE ORDER QUASHING DEPOSITION OF MEG NEWMAN - 1
(CAUSE NO. 2:2-CV-00754 JLR)

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CERTIFICATE OF SERVICE

I hereby declare that on this 30th day of August, 2022, I caused a copy of *Declaration of Meg Newman in Support of Defendant Brand Shared Services, LLC's Motion for Protective Order Quashing Deposition of Meg Newman* to be electronically filed with the Court using ECF-Filing system which will send notification of such filing to the following:

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s/Valerie Macan
Valerie Macan

DECLARATION OF MEG NEWMAN IN SUPPORT OF DEFENDANT'S MOTION
FOR PROTECTIVE ORDER QUASHING DEPOSITION OF MEG NEWMAN - 3
(CAUSE NO. 2:21-CV-00754 JLR)

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